

EXHIBIT 50

To: Sales Associates

What: Script & Talking Points Regarding RETAIL Controlled Substance Threshold Inquiries or Threshold Changes Being Made

Background

- As a pharmaceutical distributor, McKesson has the responsibility for helping to prevent pharmaceutical controlled substances from being diverted for nonmedical or other illegal purposes.
- Distributors are obligated to design and operate a system to detect and report suspicious orders. Suspicious orders include orders of unusual size, orders deviating substantially from normal patterns, and orders of unusual frequency.

If a customer calls with questions regarding an OMIT for controlled substances or about changes to our program, the following information is being provided.

- *The script is intended for verbal discussions with customers only; do NOT share this document with customers in written form.*
- **Customer calls because they received a controlled substance OMIT and they want to find out if they have reached their monthly threshold.**
- If you are getting an OMIT, it means you've reached your monthly threshold.
- **Customer asks if we have changed their threshold.**
 - As a part of our controlled substance monitoring program, we have and will continue to conduct reviews and make programmatic changes based on statistical, regional, geographic purchasing profiles.
 - We have implemented a more sophisticated data analyses process to set thresholds for our customers. We are analyzing our own sales data to identify average pharmacy purchase profiles on a regional basis. This means that thresholds are being established based on our customers, our distribution data and the geographical markets we serve.
 - I do not know if your specific threshold has been changed, but I do know that we are not communicating thresholds or providing threshold warning reports.
 - The statistical analysis is structured to be dynamic, not static, as purchasing patterns and diversion trends change.
- **Customer requests to know their exact monthly threshold limit.**
 - We are not communicating specific thresholds or providing threshold warning reports. We believe this is a better practice. Thresholds are not intended to allow customers to manage against a number. We strongly believe that customers should exercise their corresponding responsibility¹ one prescription at a time. Prescription drug abuse is an epidemic, and we all must do our part to fight this nationwide problem.

¹ See customer education material referenced in resource section at end of this document for details regarding a pharmacy's corresponding responsibility

- **Customer requests a threshold increase.**

- We are not routinely making any customer –requested threshold changes. As indicated, thresholds are being set based on data analysis done on our customers, our distribution data and the geographic markets that we serve.

[If customer indicates need for an increase]

- If you believe you do not fit the average profile or have a circumstance for threshold consideration, I will need you to provide me factual details regarding your pharmacy business model, specific circumstances, and supporting evidence of your need for this specific request. Please submit this information to me and I will forward it for regulatory compliance review. Please be aware, however, that we may require additional information from you in order to complete our review of this request.

Resources:

- For additional information on industry trends and background materials, please reference the following resources that can be found on **FETCH**:
<https://www.gosavo.com/fetch/CustomPage/View.aspx?id=1950281&srld=21968783&srspirm=False&sritidx=0&srpgidx=0&srpgsz=1>
- **Controlled Substances Sales Overview, August 2013**
- **McKesson customer educational piece, August 2013**
- **Other controlled substance reference materials:**
 - *Code of federal regulation that pertains to a pharmacist's corresponding responsibility*
 - *DEA presentation*
 - *NSDU – 2011 National Survey on Drug Abuse and Health: Mental Health Findings*
 - *NIH- revised Dec 2012 - National Institute on Drug Abuse Report*
 - *AZ Bests practices*

Websites:

- www.drugabuse.gov
- <http://www.deadiversion.usdoj.gov/>
- www.whitehouse.gov/ondcp
- www.cdc.gov
- http://www.samhsa.gov/data/NSDUH/2k11MH_FindingsandDetTables/Index.aspx
- www.DEAChronicles.com
- www.GetSmartAboutDrugs.com
- www.JustThinkTwice.com